Finish Line Grants Q&A as of July 23, 2019

The following document answers frequently asked questions about Finish Line Grants. This document will be updated regularly with changes and further questions. Please read through the entire document or use topics list to find the section related to your specific question. The North Carolina Department of Commerce Division of Workforce Solutions and the North Carolina Community College System Office continue to refine materials and processes. If you have questions, concerns, or suggestions about the Finish Line Grants program that are not addressed below, please contact the Finish Line Grants Coordinator at DWS.

Note to Workforce Development Boards: This document is intended to assist boards as they analyze and consider questions and issues surrounding Finish Line Grants; however, it does not supersede any policy statement or guidance promulgated by federal or state agencies. All applicable local board policies must be followed.

Topics:

- A. Finish Line Grant General Information
- B. Student Eligibility for Finish Line Grants
- C. Covered Expenses Under the Finish Line Grants Program
- D. Implementation and Processes
- E. WIOA-Specific Questions

A. Finish Line Grant General Information

1) What is a Finish Line Grant?

Finish Line Grants are grants of up to \$1,000 awarded to community college students who are on the cusp of completing their education or training and are faced with an unanticipated financial hardship that may prevent them from doing so. Too often, financial emergencies like unexpected healthcare costs, childcare expenses or car breakdowns prevent students from completing their programs. Finish Line Grants are awarded to students facing these unforeseen challenges. They can be used for course materials, housing, medical needs, dependent care, or other financial hardships that students face through no fault of their own.

2) When did the program launch?

The first Finish Line Grants were available to community college students in fall 2018.

3) Are Finish Line Grants available at all community colleges?

Yes. All 58 community colleges in North Carolina have partnered with their local workforce development board (WDB) to apply for funding. The community college, WDB staff, and NCWorks Career Center staff—the "partnership"—works together to administer the Finish Line Grants program.

4) Why does this program only apply to community college students?

Governor Cooper's proposed budgets in both 2018 and 2019 provided funding for Finish Line Grants to be made available for students at four-year public and private institutions, in addition to community college students. As the General Assembly failed to fund the Finish Line Grants program, Governor Cooper has made available up to \$7 million of federal WIOA funds that will specifically target community college students.

5) How quickly will a student be able to get a Finish Line Grant?

Students should be able to receive a Finish Line Grant within three business days upon submitting all documentation required by the partnership. Partnerships should structure the student application and review process to ensure grants are distributed as soon as possible after it is determined that a student is eligible to receive the grant.

6) Which entity will receive and disburse this funding?

The local Workforce Development Board receives funding as soon as possible after approval of the request and is responsible for disbursing the grants to students. The initial funding amount may be all or a portion of the amount requested. Subsequent funding will be possible in the same school year depending on partnership needs and availability of funds.

7) How much money is available to fund the Finish Line Grants Program?

Up to \$7 million of federal funds from the Workforce Innovation and Opportunity Act (WIOA) is available for Finish Line Grants in the 2018-19 and 2019-20 school years.

8) What is the source of this funding?

Funding for the Finish Line Grants program comes from federal WIOA Title I funds.

9) Is this funding recurring?

Governor Cooper's most recent budget proposed recurring funding to make the Finish Line Grants program ongoing, including funding for students in four-year college and university programs. If the legislature fails to fund this budget proposal, future funding is contingent upon availability of WIOA Title I funds.

10) How much funding will be available for individual students?

The maximum grant per student per semester is \$1,000. At the community college and local workforce development board partnership's discretion, students may be eligible for grant awards in more than one semester. Partnerships may choose to use other available funds to provide additional support to students who receive Finish Line Grants.

11) Is there a designated amount of Finish Line Grants' funds per community college or per local workforce area?

No. The intent of the Finish Line Grants is to serve the entire state in an equitable manner. The Division of Workforce Solutions will review funding requests and expenditure rates to maintain an equitable distribution.

12) How does a student apply for funding?

Students can contact the main point of contact listed for their community college here: https://ncjobready.nc.gov/finish-line-grants-contact-info. Additionally, students can contact their financial aid office, local WDB, or NCWorks Career Center to inquire about Finish Line Grant applications.

For those partnerships without a co-located NCWorks Career Center on campus, it is strongly suggested to make a staff member available to students on campus part time, based on need and/or establishing a process that allows for all necessary information to be consistently collected by a campus representative who then submits it to the NCWorks partner. Significant travel time can be an impediment to access, especially for students who lack reliable transportation.

13) Who is the Finish Line Grants contact person at the local community college?

Main points of contact for each community college partnership can be found here: https://ncjobready.nc.gov/finish-line-grants-contact-info.

B. Student Eligibility

1) Who is eligible for Finish Line Grants?

In order to be eligible for a Finish Line Grant, a student must:

- Be enrolled in a North Carolina community college;
- Be in good academic standing as defined by the community college. Threshold may not be higher than a 2.0 grade point average;
- Have completed at least 50% of the degree or credential program (or be enrolled in the courses that will constitute 50% completion).

Individual partnerships may choose to include additional criteria, such as enrollment in programs providing training for high-demand occupations. While partnerships have broad discretion to choose additional enrollment criteria for Finish Line Grants, partnerships are encouraged not to restrict students enrolled in certain programs. Eligibility should include students in as many educational and training pathways as possible.

2) Can Finish Line Grant funds be used to pay the student account debt of person attempting to return to college?

No. The purpose of the Finish Line Grant is to assist <u>current</u> students who have completed (or are enrolled in) at least 50% of their degree or credential program.

3) Can someone from out-of-state who attends a North Carolina Community College be eligible? Can someone from local workforce area attending a community college in another local workforce area be eligible?

Yes. WIOA Title I funds do not have residency requirements. However, individual workforce development boards will determine eligibility of out of area residents. The Finish Line Grants Memorandum of Understanding (MOU) should address any local restrictions

related to residency.

4) Are students enrolled in college transfer eligible for Finish Line Grants?

Sometimes. It is a local decision on the inclusion of college transfer students. Partnerships have broad discretion to choose enrollment criteria for Finish Line Grants because, as local leaders, you know what works in your community. However, partnerships are encouraged to serve college transfer students wherever possible.

5) Will NCWorks Online enrollment criteria use income to keep students from participating in Finish Line Grants?

No. The U.S. Department of Labor continues to request information about family income, even when income is not a basis for program eligibility. Local partnerships may use one of the 3 approaches to address FLG participant income that are included on the NCWorks Online Staff Resources page.

6) Does the 50% completion requirement include the current enrolled semester? Yes. Community colleges will count the classes in which a student is enrolled in the current semester toward the 50%. It is the responsibility of the community colleges to verify that applicant students meet the requirement.

7) May local partnerships specify the training areas of students that receive Finish Line Grants?

Yes, although partnerships are strongly encouraged to make grants available to students enrolled in as many training program areas as possible. Partnerships may specify additional requirements for Finish Line Grant recipients, such as requiring students to be enrolled in programs of study that lead to high-demand occupations.

8) If a student applicant is pursuing a double major, does that student have to be 50% of the way through both majors to be eligible for a Finish Line Grant?

It depends. Local partnerships may make the final decision on this issue. However, it is likely that if the student has completed 50% of one of the programs or majors, they are eligible to apply for a Finish Line Grant.

9) What if a student already has a degree and is enrolled in another program, is this student eligible?

Yes, this student is eligible. Having an existing degree is not a disqualification.

10) Are students in short-term programs that lead to a credential and likely employment eligible?

Maybe. Students in short-term programs are most likely eligible. However, some local partnerships may have set program restrictions and students should check with their community college and/or local workforce development board.

11) Are students who are enrolled in more than one community college eligible? Maybe. Students enrolled in more than one community college are most likely eligible. However, some local partnerships may have set restrictions and students should check with

their community college and/or local workforce development board.

12) What happens when students have valid financial hardships and need but have not completed 50% of their program?

Unfortunately, those students are not eligible for Finish Line Grants. They should receive referrals to available assistance at their community college. Whenever Finish Line Grants cannot be granted to a student, staff should connect students with other options at the community college or elsewhere.

13) Is the 2.0 GPA in the major or is it a cumulative GPA?

This should be a local decision. Please make the decision in the best interest of the student.

14) What is considered as an enrolled student? For instance, since school is not currently in session, can a student registered for Fall 2019 classes apply now for the FLG?

For Finish Line Grant eligibility, students are considered enrolled after they have registered and have paid for or have arranged for payment (e.g., financial aid, payment plan, etc.) of tuition/registration fees. For example, if a student has registered and paid for, or arranged payment for, Fall 2019 classes, that student can apply and receive FLG assistance before the start of next semester classes.

15) Will students enrolled in summer classes be eligible for FLG?

Yes. Though the "summer term" is considered a "semester" for Finish Line Grants purposes, the amount a student can receive is limited to \$2,000 in an academic year (Fall – Spring). However, local partnerships may determine there are extenuating circumstances that would allow the student to receive up to \$3,000 for the 3 terms (Fall, Spring, and Summer). As the average of the grants distributed have been much less than \$1,000, most eligible students could receive a grant in each of the 3 terms if needed and not reach the \$2,000 limit.

16) Do outstanding payments such as library fines need to be paid before a student can receive a Finish Line Grant?

No. Student eligibility for a Finish Line Grant is not dependent on the status of other outstanding payments.

17) If a student applies for a Finish Line Grant because money is needed to pay a bill, does there have to be an unanticipated hardship associated with qualifying for a Finish Line Grant award?

Yes, explanation must be given in the student's WIOA case notes as to the fact an unexpected circumstance occurred and the nature of that unexpected circumstance. Students can attest to the emergency, for example, "spouse's job hours were cut back this month," without having spouse's employer provide a letter. Thorough notation in the student's WIOA file and following local Workforce Development Board, state, and federal policies are sufficient to document the unexpected event impacting student's ability to continue.

18) We have students returning for the same type of request month after month during

the semester. At what point is this no longer an emergency?

The intent of Finish Line Grants is to assist with unanticipated hardships. As noted in the August 2018 'Finish Line Grant Expenditures' document, "Care must be given to be sure that the expenditure solves a short-term problem...". Local staff working with students are in the best position to assess the total situation. When Finish Line Grants are not the appropriate resource, local partnerships are encouraged to work with students through referrals and connections with other avenues of assistance.

C. Covered Costs Under Finish Line Grants Program

1) Some career advisors working with Finish Line Grants have expressed concern about what constitutes an "emergency" and may be using a narrower definition than was intended. What is the Finish Line Grant initiative's definition of a qualifying emergency?

Finish Line Grants are for unanticipated financial hardships that impede a student's ability to stay enrolled in community college. Finish Line Grants are intended to assist as many students as possible without imposing restrictive interpretations of what constitutes an emergency. Staff working directly with each individual student can best assess that student's situation with the goal of putting the student first, while following applicable funding source requirements and local workforce development board policies.

- 2) Can Finish Line Grant funds be used to pay the student's tuition, fees, or books? Yes. If the student's unanticipated hardship has negatively impacted the student's ability to pay for tuition, fees, or books, then the partnership may approve the use of a Finish Line Grant for tuition, fees, or books. However, it is not the intent of Finish Line Grants to function as scholarships for tuition, fees, or books. For example, if a current student is within 50% of completing a credential and has established a payment plan for tuition, yet his/her car breaks down resulting in not having sufficient money to make a tuition payment, a Finish Line Grant could be used to pay the tuition due at that time.
- 3) Please elaborate on medical needs that are appropriate for this project.

Finish Line Grants are appropriate for any medical need that jeopardizes a student's ability to complete training. Where medical needs are long-term and require additional financial resources, the staff working with the student should ensure that other resources have been identified for ongoing medical issues.

- 4) Can Finish Line Grant funds be used for students' family members?

 In some circumstances, yes. For example, if a dependent child of a student encounters an unanticipated event like a broken arm and payment of the emergency hospital bill affects the student's ability to complete training, a FLG may be used to help with that hardship.
- 5) Can FLG be used for current due rent or utility bill without a past due bill, disconnection or eviction notice?

Yes, a FLG can be used for current due rent or other bills if the eligible student has experienced an unanticipated hardship that impacted the student's ability to complete their

course of study. Waiting for past due notices may result in damage to a student's credit and possible additional fees.

- 6) If a student who has applied for a FLG to assist with a utility bill that is not in the student's name, but is in the spouse's name can the FLG be utilized for the student? Yes, if the bill is for services at the student's residence, it is valid for FLG consideration regardless of whether the spouse or the student is listed on the utility records.
- 7) A student needs to get a car repair to pass inspection due to hitting a deer and is requesting assistance towards her insurance deductible of \$500—can we pay for the insurance deductible portion in order to keep her car on the road and enable her to go to school?

Yes, this is an unexpected event.

8) A student has been determined eligible for a Finish Line Grant, but his repair bill is for more than the \$1,000 available from FLG. May the \$1,000 be awarded to apply towards total cost?

Yes, the FLG does not need to cover the entire cost of an emergency. It is intended to help with any eligible cost up to \$1,000. The staff working with the student should ensure that other resources have been identified for the repair balance and that the repair entity completes the repair and accepts the Finish Line Grants payment along with the remaining payment from another source.

9) Can a car repair be paid if the student does not have title to that car?

Yes, if it is the main, full-time transportation that the student uses to attend the college.

10) Can licensure exams be funded through FLG?

Yes, Finish Line Grants may be used for required testing as relates to obtaining licensure, certification and/or completion of requirements for course of study if students are eligible for FLG and, as always, if local, state and federal policies are followed. The licensure exam is considered a continuation of the course of study.

11) Is paying for internet an allowed cost?

Yes. If a local determination is made that an unforeseen event prevents a student from paying a month of internet service or setting up internet service needed for current course work, an FLG may be granted. In some cases, there can be difficulty in avoiding paying for "bundled services" that may include cable television, etc., rather than solely internet service. Local staff should be mindful that often the entire bundled service must be paid to keep internet functioning. Bundling of services should not disqualify students from receiving a FLG.

D. Implementation and Processes

1) Is there a state-wide logo for Finish Line Grants?



Please use the name "Finish Line Grants" as the state-wide identifier in materials.

2) Does funding go directly to students?

No, funds should not be distributed directly to students. For example, if a student applies for a Finish Line Grant to pay for a car repair, the approved payment will go to the car repair entity; if a student applies for a Finish Line Grant to cover an unexpected medical expense, the approved payment will go to the healthcare entity. Grants for gas and groceries may be distributed through gift cards as determined by the partnership.

3) How will grant decisions be made?

The community college and local workforce development board will establish a standardized joint process for reviewing funding requests and deciding who will be awarded a Finish Line Grant. Decisions should be made in the best interest of the student wherever possible.

4) Who is responsible for the funding and for student employment outcomes?

The WDB will be responsible for the WIOA funding. Additionally, the WDB must gather WIOA eligibility and related documentation from the student, enter data into NCWorks Online, provide ongoing case management services, and track the credential attainment and employment outcomes of the student. This student becomes the responsibility of the WDB for federal performance outcomes purposes.

5) What happens if a student receives a Finish Line Grant and still fails to complete his or her training?

Grants will not be conditioned on students completing any additional requirements (e.g. community service hours) but every effort should be made to ensure that students are highly likely to continue their training. There will be no pay-back requirement unless it is determined that the student acted fraudulently in obtaining or using the Finish Line Grant. Community colleges and local workforce development boards may want to adjust their process of determining eligibility if it is found that students receiving Finish Line Grants frequently fail to complete training.

6) What about FERPA compliance?

The partnership MOU should outline the student data that will be shared between the partners and should only be data that is required for processing and evaluating the program. Further, a notification of data sharing should be on the student request form so that the student has been notified that his/her data will be shared by the partnership.

7) How will participants be enrolled in NCWorks Online?

A service code, "FLG", will be entered in NCWorks online. More details on the NCWorks Online enrollment is included on the NCWorks Online Staff Resources page.

8) Will the WDBs disburse Finish Line Grants' payments to the providers of the emergency services?

WDBs can provide the payments directly or the local college may make the payments and invoice the WDB for reimbursement. In all cases, sufficient documentation of expenses is required for audit purposes.

9) Will tracking of credentials obtained be done through NCWorks Online?

Yes, the FLG service code must be entered, codes for all services provided will be used, case notes maintained, and all credentials attained will be recorded in NCWorks Online.

10) Who is to be listed in NCWorks Online as the provider for emergency payments?

That guidance is included in the Finish Line Grants instructions on the <u>NCWorks Online</u> Staff Resources page.

11) Will there be additional funding to local areas for increased caseloads and administrative expenses?

Maybe. The Division of Workforce Solutions will consider requests for additional funding to meet needs generated by Finish Line Grants operations.

12) May a FLG Partnership purchase gas or grocery cards in advance?

Yes. FLG Partnerships are encouraged to purchase gas or grocery cards in advance if permissible under the purchasing entity's financial policies. As gas and grocery cards are, in effect, cash on hand, appropriate care should be taken to safeguard the cards, to require recipients to sign for the card value they receive, and to hold a limited number of cards on hand (as cards purchased in the current program year cannot be carried over into the next program year).

13) Are all details of Finish Line Grants' procedures final?

No, Finish Line Grants procedures are a work in progress. Please make suggestions for improvements to North Carolina Department of Commerce, Division of Workforce Solutions and the North Carolina Community College System points of contact.

14) Is there a budget template for the Finish Line Grants application?

No. The application does not request a line-item budget. It does ask for the level of funding the local partnership needs, along with planned use of the funds and this should be included in the application.

15) Will Finish Line Grants be operated in-house by local WDBs or by local WIOA contractors?

This will depend on the local partnership. The details of who performs enrollment into

NCWorks online and other related roles will be determined locally. However, Finish Line Grant participants will receive case management services so at some stage it is likely that participants will be working with WIOA contracted services staff.

16) Is there flexibility in the 72-hour requirement to fulfill requests?

No. The purpose of Finish Line Grants is to meet student financial needs in true emergency situations. To do so, program staff must evaluate and determine responses to students' requests within three business days.

17) If a community college works with more than one local workforce development board, can there be one application for that college?

Maybe. If both local workforce development boards use the exact same process for Finish Line Grants, this is a possibility. If not, the community college should direct students to use the specific application relevant to the workforce development board that will be overseeing that particular student's grant.

18) Should financial aid offices vet potential awards for people receiving student aid (e.g., Pell Grant, Student Loans, etc.)?

Yes, financial aid officers should review potential FLG awards because receiving an award could impact the cost of attendance and the un-met need of the student. The scenarios are complex and are best evaluated by financial aid officers.

19) May Workforce Development Boards' WIOA contractors make FLG payments and be reimbursed by the WDB, or may only community colleges and WDBs make payments?

Yes, Finish Line Grants Partnership Proposals may designate WIOA contractors to make payments. Reimbursement will be made by the Workforce Development Boards following established procedures with their contractors.

20) Can Partners conduct a public relations campaign regarding the Finish Line Grants?

Yes, outreach to inform students about Finish Line Grants may be conducted with federal funds. Unallowable advertising and public relations expenses with federal funds are detailed in US Office of Management and Budget Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Funds 2 CFR 200.421. General advertising, public relations and marketing activities may also be conducted with non-federal resources.

21) We want to enroll students that are in longer-term training programs, but how do we keep them on our caseload until they complete training?

WIOA rules state that a WIOA program participant (student) must be provided a WIOA-recognized service at least every 90 days or the student will be "exited" from the WIOA database. That exit then starts a 6-month and a 12-month clock when WIOA measures a student's employment outcome and median earnings. The student is expected to be working at both the 6-month and the 12-month points after exit. This process is how the program performance of each WDB is measured.

FLG students that are in longer-term training and enrolled in WIOA must be provided services at least every 90 days until graduation or they will be exited 90 days after the FLG assistance is provided. In the latter case, the WDB will hope that the student is employed in a good job while continuing to attend school.

22) Is there fiscal guidance for the procurement and purchase of goods and services using FLG funding?

Yes. Each Workforce Development Board must follow federal funds requirements as outlined in the most current <u>Division of Workforce Solutions Policy Statement on Procurement and Contracting Policy.</u>

23) What are the standards for vetting requests; is there a standard rubric across the state?

No, there is not a standard rubric. While general guidance has been provided through the FLG Questions and Answers and Finish Line Grants Expenditures document, each local partnership has discretion. The use of WIOA funding requires all local, state and federal policies for WIOA be followed. Consistent with the fact that FLG is locally operated, each partnership may determine "criteria to be used in deciding if student will be awarded a FLG" as outlined in their FLG Partnership Proposal.

E. WIOA-Specific Questions

1) What are the Workforce Innovation and Opportunity Act (WIOA) eligibility requirements?

It is expected that Finish Line Grant participants will be enrolled in WIOA Title I as Adults and must be 18 years of age or older; a citizen of or eligible to work in the United States; if male and subject to Selective Service, registered with Selective Service.

2) Are Finish Line Grants considered WIOA Title I Supportive Services?

Yes. WDBs will need to follow or revise their existing Supportive Service Policy to adhere to this initiative or may develop a specific Finish Line Grants Supportive Services Policy.

3) Do the WIOA Priority of Services requirements apply to Finish Line Grants?

No. Finish Line Grants are funded through WIOA state set-aside funds and not subject to Adult Formula Priority of Services. WDBs may develop a Priority of Services policy for Finish Line Grants or may use existing local WDB Priority of Services policy; however, doing so is not required.

4) Can a FLG student applicant who is currently a WIOA Dislocated Worker participant be enrolled in the Finish Line Grants activity without having to enroll as a WIOA Adult?

No, the student will still need to be enrolled in the Statewide Adult category since the WIOA funds for FLG are statewide activities funds.

5) May the Finish Line Grants options for documenting income be used for other WIOA programs?

No. The information provided on Finish Line Grants is specific to Finish Line Grants participants. Programs issue specific information relevant to each program based on type of funding, program requirements and objectives.

6) Are there suggestions on ways to streamline the WIOA Title I enrollment process and make it less burdensome on the student?

Local partnerships should seek ways to make the WIOA eligibility/enrollment as efficient as possible. Those may include:

- Ensuring that all appropriate staff understand the eligibility/enrollment process and the documents required
- Clearly publicizing the eligibility for the program and the documents that a student must provide
- Having a dedicated space on campus for the eligibility/enrollment process with staff easily accessible to the student. This should include having case managers on campus.